

June 3, 2021

Mr. David Albright  
Manager, Groundwater Protection Section  
USEPA Region 9 (WTR-4-2)  
75 Hawthorne St  
San Francisco, CA 94105

Subject: Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1  
30-day Report for AL/AQL Exceedances at Supplemental Monitoring Well M60-O

Dear Mr. Albright:

Florence Copper is providing this 30-day report as required under Underground Injection Control (UIC) Permit Number R9UIC-AZ3FY11-1 (Permit) Parts II.H.2.a.iv. and II.H.2.b.iv for an alert level (AL) and Aquifer Quality Limit (AQL) exceedance for adjusted gross alpha, and an AL exceedance for radon at supplemental monitoring well M60-O.

Analytical results from a routine Level II quarterly sample collected from monitoring well M60-O in April 2021 showed an adjusted gross alpha value of  $22.2 \pm 2.5$  pCi/L. The AL and AQL for adjusted gross alpha are 17.4 pCi/L at this well. The analytical results also showed an AL exceedance for radon with a value of  $3073 \pm 308.1$  pCi/L – above the AL of 2480 pCi/L.

A prior exceedance of the AL/AQL for Adjusted Gross Alpha was reported to EPA in 2020, and a 30-day Report was submitted on November 27, 2020. The report noted that elevated adjusted gross alpha concentrations at M60-O were noted two months prior to wellfield operations commencing, and that no indicator parameters (pH, conductivity, sulfate) exceeded their respective AL/AQLs. Additionally, results from a duplicate radiochemistry sample sent to a different laboratory were below the AL/AQL.

A prior confirmed exceedance of the AL for radon occurred in October 2020 and was first reported to ADEQ on December 2, 2020. The 30-day Report for this event was submitted on December 31, 2020, and mitigation measures consisted of running a video log of M60-O and redeveloping the well by airlifting.

Florence Copper has conducted an evaluation of the cause, impacts, or mitigation of the current AL/AQL exceedances. Hydraulic control has been maintained in the wellfield as required by the Permit throughout the operation of the PTF and continues today. No malfunction of pollution control devices or other equipment or processes occurred that contributed to the AL/AQL exceedances. Level 1 water quality indicator parameters (sulfate, magnesium, fluoride, and TDS) were all below their respective AL/AQLs during the April sampling event.

Mitigation activities consisting of flow adjustments in the wellfield, pumping nearby observation wells, and redevelopment of recovery wells have been implemented. Florence Copper will continue to collect monthly samples from M60-O, analyze for the parameters which exceed the ALs and/or AQLs, and will report these results monthly to EPA until all concentrations are below the ALs and AQLs.

Please feel free to contact me should you have any questions or comments.

Sincerely,  
**Florence Copper, Inc.**

A handwritten signature in blue ink, appearing to read "Brent Berg", with a long horizontal flourish extending to the right.

Brent Berg  
General Manager

Cc: Nancy Rumrill, EPA Region 9  
Maribeth Greenslade, ADEQ